

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Dionisio A. Batista  
Debtor

: Chapter 13  
: Case No. 17-12419

**Hearing to be held  
November 9, 2017 at 9:30 a.m. in  
U.S. Bankruptcy Court  
400 Washington St., 3rd floor,  
The Madison Bldg., Reading, PA 19601**

**DEBTOR'S OBJECTION TO PROOF OF CLAIM NO. 3  
FILED BY TOYOTA MOTOR CREDIT CORPORATION**

NOW COMES the Debtor, Dionisio Batista, by and through his attorney, John A. DiGiamberardino, Esquire, and object to Proof of Claim No. 3 filed by Toyota Motor Credit Corporation, and in support thereof, avers the following:

1. The Proof of Claim asserts a security interest in a 2014 Toyota RAV4, in the amount of \$27,132.87 a copy of the Proof of Claim is attached hereto as Exhibit "A".
2. The value of the collateral is substantially less than the amount of the secured claim filed by One Main Financial, the value of the collateral being no more than \$12,500.00 based on its mileage and condition.
3. Pursuant to 11 U.S.C. 506, a creditor can be secured only to the extent of the value of its collateral.
4. The secured claim of Toyota Motor Credit Corporation is secured only to the extent of \$12,500.00

WHEREFORE, the debtor objects to Proof of Claim No. 3 filed by Toyota Motor Credit Corporation.

**CASE & DIGIAMBERARDINO, P.C.**

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